

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS,
EASTERN DIVISION**

Dionte Young)	
)	
Plaintiff,)	Case No: 17-cv-01914
)	
v.)	Judge Sarah L. Ellis
)	
Thomas J. Dart, Cook County Sheriff,)	
et al.)	
)	
Defendants.)	

**PLAINTIFF'S FIRST UNOPPOSED MOTION TO EXTEND TIME TO
CONDUCT DISCOVERY AND RE-SCHEDULE STATUS HEARING**

Now comes Plaintiff, Dionte Young, by and through his attorneys, Rooney Rippie & Ratnaswamy, LLP, and respectfully requests for an extension of time within which to conduct discovery proceedings and to re-schedule the up-coming status hearing, stating as follows:

1. On July 18, 2018, Plaintiff filed his Second Amended Complaint. *See* Docket No. 38. Executed waivers of service for each named Defendant were then filed by the Plaintiff on August 9, 2018.

2. On September 20, 2018, the Court entered an Order establishing the discovery schedule in this case. *See* Docket No. 52. Fact discovery was thereby set to close on January 18, 2019. A status hearing was scheduled by the Court in the same Order for January 17, 2019. On January 7, 2018, the Court changed the time of the status hearing, still to be held on January 17, 2019. *See* Docket No. 58.

3. Plaintiff is still waiting for medical records to be produced by Cook County Health System and Illinois Department of Corrections. These records have been requested and have still not been received, but Illinois Department of Corrections has indicated that it is in the

process of locating the records. Plaintiff's counsel must receive and review these records before fact discovery, including treating physician depositions if necessary, can be completed.

4. A one hundred twenty day extension is requested in in order to allow these steps to be completed. This Motion is made in good faith for purposes of necessity, and only in order to obtain additional time to properly conduct discovery, and not for purposes of delay.

5. Part of Plaintiff's counsel, Marjorie Kennedy, was involved in a serious accident on December 4, 2019, when a vehicle struck her in a crosswalk. Ms. Kennedy had major surgery and will not be in a position to return to work for at least two months, likely longer. During this time, Plaintiff's counsel has had to transition work. Ms. Kennedy authorized providing this information to the Court and counsel. As such, Ms. Kennedy is unable to attend the status hearing scheduled for January 17, 2018.

6. Other persons part of Plaintiff's counsel will also be unavailable at the scheduled time of the status hearing. Mr. E. Glenn Rippie will be travelling via airplane at the time of the hearing. Ms. Jacqueline Vidmar will no longer be employed at the same firm at the time of the hearing.

7. Plaintiff requests that the Court re-schedule the upcoming status hearing for a later date, as it pleases the Court. This Motion is made in good faith for purposes of necessity, and only in order to ensure proper attendance at the status hearing, and not for purposes of delay.

8. Plaintiff's counsel has conferred with Defendants' counsel and Defendants' counsel does not oppose this Motion.

WHEREFORE, Plaintiff respectfully requests that this Court enter an order extending the time to complete discovery by one hundred twenty (120) days to May 18, 2019; re-schedule the

upcoming status hearing from January 17, 2019, to a time best served by the Court; and grant such other further relief as this Court may deem fair, just, and proper.

Dated: January 14, 2019

Respectfully submitted,

By: /s/ E. Glenn Rippie
E. Glenn Rippie, Attorney for Plaintiff

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